

Nika Aldrich, OSB #160306
Email: naldrich@schwabe.com
SCHWABE, WILLIAMSON & WYATT, P.C.
1420 5th Avenue, Suite 3400
Seattle, WA 98101
Telephone: 206-622-1711
Facsimile: 206-292-0460

*Attorney for Defendant
Cronometer Software, Inc.*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

ESHA RESEARCH, INC., now known as
TRUSTWELL,

Plaintiff,

vs.

CRONOMETER SOFTWARE, INC.,
formerly known as **BIGCRUNCH**
CONSULTING, LTD., and **DOES 1-20**,

Defendants.

No. 3:24-cv-01586-AB

**NOTICE OF APPEARANCE AND
WAIVER OF SERVICE**

Nika Aldrich of Schwabe, Williamson & Wyatt, P.C., hereby appears as counsel of record for Defendant Cronometer Software, Inc., formerly known as BigCrunch Consulting, Ltd. (“Cronometer”) in the above-captioned case.

All further pleadings and notices should be directed to:

Nika Aldrich, OSB #160306
SCHWABE, WILLIAMSON & WYATT, P.C.
1420 5th Avenue, Suite 3400
Seattle, WA 98101
Telephone: 206.622.1711
Facsimile: 206.292.0460
Email: naldrich@schwabe.com

FURTHERMORE, Cronometer hereby provides notice to the Court that, on September 19, 2024, Plaintiff sent Cronometer's counsel a request for waiver of service. Pursuant to an agreement between the parties, Cronometer, a Canadian company, agreed to waive service and counsel for Plaintiff agreed that the request would be treated as if it was "sent to the defendant outside any judicial district of the United States," such that a response would be due 90 days after the waiver request was sent, pursuant to Fed. R. Civ. P. 4(d)(3). Accordingly, the Parties agree that a response is due by December 18, 2024. (*See Exhibit 1.*)

Dated this 22nd day of October, 2024.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

s/ Nika Aldrich

Nika Aldrich, OSB #160306
Email: naldrich@schwabe.com

Attorney for Defendant Cronometer Software, Inc.